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June 17, 2025

Via Electronic Mail: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Re: **Tecspect LLC, et al. v. Michael Donnolo, et al.**
Civil Action No. 24 Civ. 8077 (JHR)

Dear [REDACTED]:

As you are aware, this firm represents Plaintiffs Tecspec LLC, Robert Senia, Richard Rose, and Ralph Schlenker ("Plaintiffs") in the above-referenced matter. On June 6, 2025, Judge Rearden issued an order enjoining Michael Donnolo "from directly or indirectly engaging in, carrying on, or being connected with or interested in any business activities concerning the manufacturing of HVAC units for any projects located in ... New York County[.]". A true and correct copy of the June 6, 2025 order is enclosed hereto.

It has come to our attention that [REDACTED] has or is planning to contract with Michael Donnolo, via Braya Systems LLC, Braya Machine Company LLC, Braya Concepts LLC, and/or Braya Ventures LLC, for the manufacturing of HVAC units for a project located in New York County. Should [REDACTED] proceed with contracting with Michael Donnolo, in clear contravention of the Court's June 6, 2025 order, Plaintiffs will have no choice but to seek court intervention, including but not limited to seeking an order of contempt, sanctions, and/or injunction against [REDACTED] to enjoin them from same.

Please be guided accordingly.

Should you have any questions, I am available to discuss this matter further.

Plaintiffs reserve all rights.



June 17, 2025

Page 2

Very truly yours,

COLE SCHOTZ P.C.

/s/ Jason R. Melzer

Encl.



June 17, 2025

Page 3